

EXHIBIT A

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1 UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4 EL-AMIN MUHAMMAD,
5 No. 242898,
6 Plaintiff,
7 V.
8 DETECTIVE KYLE A. NEHER,
9 et al.
10 Defendants.

Case No. 1:16-cv-276

HON. JANET T. NEFF

U.S. MAGISTRATE JUDGE RAY KENT

10 DEPOSITION OF:
11 EL-AMIN MUHAMMAD
12 Tuesday, July 24, 2018
13 Alger Correctional Facility
14 N6141 Industrial Park Drive
15 Munising, Michigan 49862

16 APPEARANCES: MR. BRADLEY C. YANALUNAS (P80528)
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21 RECORDED BY: Tammy L. Hanson/CER 7005
22
23
24

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1 [REDACTED] 2007.

2 Q [REDACTED] Okay. How long were you at URF for?

3 A [REDACTED] Maybe two years.

4 Q [REDACTED] So, you would've been at URF from 2007 to 2009?

5 A [REDACTED] Approximately. From there, I went to Kinross.

6 Q [REDACTED] To Kinross. And that's also in the U.P.?

7 A [REDACTED] Yes.

8 Q [REDACTED] So, you were there from 2009 to when?

9 A [REDACTED] Two thousand and twelve.

10 Q [REDACTED] And after Kinross?

11 A [REDACTED] Bellamy Creek Correctional Facility in Ionia, Michigan.

12 Q [REDACTED] Bellamy Creek?

13 A [REDACTED] Yeah.

14 Q [REDACTED] B-e-l-l-a -- I'm sorry. B-e-l-l-a --

15 A [REDACTED] M.

16 Q [REDACTED] -- m-y?

17 A [REDACTED] Yes.

18 Q [REDACTED] In Ionia?

19 A [REDACTED] Yes.

20 Q [REDACTED] And that was from 2012 to when?

21 A [REDACTED] Two thousand fourteen.

22 Q [REDACTED] And then you were released on parole?

23 A [REDACTED] Yes.

24 Q [REDACTED] In January of 2014?

25 A [REDACTED] Yes.

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1 Q Okay. Okay. And that brings us to -- well, you said

2 you were -- you were released in January and then you

3 were picked up July 17, 2014?

4 A Yes.

5 Q For your parole violation?

6 A Yes.

7 Q And so you had spent -- you spent July 14 up -- up until

8 August 1 in Ionia County?

9 A Yes.

10 Q Why were they transferring you to -- or strike that.

11 And they were transferring to Muskegon County,

12 right, on August 1, 2014?

13 A Yes.

14 Q Why were they transferring you to Muskegon County?

15 A For an alleged crime that happened in July the

16 fourteenth of two thousand and fourteen.

17 Q What was the alleged crime?

18 A Armed robbery.

19 Q Armed robbery. Were you ever convicted of that?

20 A Yes.

21 Q When were you convicted?

22 A Two thousand and sixteen.

23 Q How long did you spend at the Mus -- Muskegon County

24 Jail after August 1, 2014?

25 A About -- approximately a year.

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1 A I haven't -- I haven't actually got X -- I mean, like
2 MRI, nothing like that.

3 Q But any diagnosis by any physicians?

4 A Well, the physician at the Muskegon County Jail said I
5 had a lumbar strain.

6 Q When was that?

7 A In 2014.

8 Q And what physician was that?

9 A I believe his name was Joseph No -- Noel -- Note --
10 Notele or Natole. I got his name.

11 Q I believe you told us the name earlier.

12 A Yeah. I'm not sure if I'm pronouncing his last name
13 correct or not.

14 Q That's all right as long as we can spell it --

15 A Okay.

16 Q -- which I believe you spelled it --

17 A N-a-t-o-l-e.

18 Q Yeah, N-a-t-o-l-e. Any other diagnosis by Dr. Natole?

19 A No.

20 Q Do you recall any other doctors diagnosing you with any
21 other issues after 2014?

22 A Just that I had the back -- the back injury. They just
23 basically give me like exercises to do to strengthen the
24 muscles in my back, advice on what to do and what not to
25 do in relation to furthering my injuries and stuff like

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1 that. And they just made sure that I'm on pain

2 medication, for the most part --

3 Q All right.

4 A -- because there's no really -- there was no way for
5 them to actually determine the ext -- extent of my
6 injury because of the cost to send me out and do an MRI
7 and all of this stuff. So --.

8 Q So, you're -- you're saying that the -- the medical
9 treatments that doctors have provided you are based on
10 your subjective determination that you have an injury.
11 You're telling them my back is hurting, how can I fix
12 it. That's --

13 A They -- they --

14 Q -- the long and short of it?

15 A -- they -- they did like physical examinations to
16 determine injury for it.

17 Q And what was their determination?

18 A That I have a back injury.

19 Q What was the back injury?

20 A I don't -- some -- I -- I guess my disc is out of place
21 --

22 Q Your disc --

23 A -- or I got some type of disc issue.

24 Q And when was the first time you notified that you had a
25 disc issue in your back?

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1 Q No. Any other parts of your body hit any -- anything
2 other than the partition that you recall?

3 A Not that I recall.

4 Q Okay. So, they hit the deer. They're -- do they -- do
5 they skid before they hit the deer or do they hit the
6 deer, then skid; are they trying to avoid the deer?

7 A No, they didn't start skidding until like during impact.

8 Q So -- so they didn't start -- the car didn't start doing
9 -- skidding or bouncing up and down, as you said --

10 A Like doing --

11 Q -- until after the deer was hit?

12 A Right. The impact, boom and then it was, I guess,
13 trying to regain control of the vehicle.

14 Q Okay. Did you go off the road at all?

15 A I don't think they did. I think they -- in the process
16 of stopping at the impact, they pulled over to the side
17 of the road.

18 Q Okay. At that -- at that point, the car's pulled over
19 on the side of the road, do you communicate that you've
20 been injured at all or do -- do they ask you, hey, are
21 you okay; what is -- how does that -- anything -- any
22 conversation between the driver and you or the passenger
23 and you?

24 A I believe Neher opened my door.

25 Q The passenger?

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1 A I believe so.

2 Q Okay.

3 A And he looked in and I -- and I told him I -- I might
4 need to see a nurse or a medic 'cause I'm experiencing
5 some pain. Then he closed the door. And then Kasher
6 came back to the car, 'cause he had got out of the car
7 to, I guess, check out the damage and all of that stuff.
8 And then he came back and cracked the window 'cause the
9 windows were rolled up. It was hot. It was real hot
10 outside.

11 Q Yup.

12 A And then they never came back to the vehicle after that.
13 They stood outside of the vehicle for maybe -- I would
14 say 20 to a half an hour before the state police trooper
15 came.

16 Q All right. Well, let's kind of unpack this a little
17 bit. So, Neher comes around to your side and opens the
18 door?

19 A Yes.

20 Q And you say you need to see -- you need medical
21 attention, you need to see a nurse?

22 A Yes.

23 Q Did you say -- was it -- did you say call an ambulance;
24 did you ask for an ambulance?

25 A A medic.

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1 another --

2 Q So, then --

3 A -- another vehicle.

4 Q -- then let's go back. So, you're -- you're still in
5 the original vehicle.

6 A Yes.

7 Q How long until -- so -- and -- and then you said Kasher
8 called for the alternate vehicle?

9 A One of them called.

10 Q One of them called?

11 A Yeah.

12 Q All right. How long until that alternate vehicle
13 arrived at -- at the scene?

14 A The -- we -- we didn't transfer vehicles at the scene of
15 the crime -- I mean at the scene of the accident.

16 Q Okay.

17 A They brought me to Muskegon in the damaged vehicle.

18 Q Oh, okay. So, it was -- the damaged vehicle was still
19 drivable?

20 A Yeah, they --

21 Q Okay.

22 A -- had to do something to the front of it and then after
23 they did whatever they did to the front of the car, then
24 they pull it off.

25 Q Okay. So, you -- during -- while you were at the scene

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1 was the ride; was there any -- was there any issue from
2 that parking lot to the Muskegon County Jail?

3 A Issue as far --

4 Q Any -- any issues of -- any -- anything that you can
5 recall or was it just a smooth ride; any -- anything
6 that you can recall?

7 Did you -- did you -- actually, let me go back.

8 Did you -- when you were -- when you were switching
9 vehicles, did you ever ask the other drivers -- do you
10 know who the other drivers were of this alternate
11 vehicle?

12 A I don't know -- I didn't know his name at the time, but
13 I have his name now.

14 Q Okay. What was his name?

15 A It's in the discovery from the Muskegon County Jail, the
16 intake paperwork. I don't -- I don't believe I have
17 that on me.

18 Q All right. Did you tell this individual hey, I -- I
19 need an ambulance to -- like I'm -- I'm injured?

20 A I actually asked him was we going to the hospital.

21 Q And what did he say?

22 A He said he was instructed to take me to the Muskegon
23 County Jail and I asked him was I gonna see a doctor or
24 a nurse when I was -- when I arrived there and he told
25 me it's not really up to him. I don't -- I don't know.

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1 know, personal articles.

2 Q Sure. And they what -- do you -- could they -- any of
3 that go past the -- the -- into -- into the jail or do
4 they --

5 A Not on me. That's why they took it.

6 Q Gotcha. Okay. So, the transport officer, is -- is he
7 bringing you into book?

8 A Just to intake. Hairston did the booking.

9 Q Okay. So, the transport officer -- officer takes you
10 into intake. Are there any other officers there?

11 A No.

12 Q Okay. So, when you get to intake, what happens?

13 A Hairston -- Hairston came out the back --

14 Q Okay.

15 A -- and then he --

16 Q Directed you?

17 A -- he basically took over where the transport officer
18 left off.

19 Q Okay. Now, did you tell Hairston at that time, when he
20 comes out to take you from the transport officer, do you
21 say hey, I'm injured, I need to see a nurse?

22 A Yes.

23 Q Okay. You told him right then. All right. Well, do
24 you remember what -- what you told him; did you tell him
25 what was hurting or --?

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1 A I was told him I was just in an accident; I'm not sure
2 if the facility knows about it, but I need to see a
3 doctor or -- or a nurse.

4 Q And does he respond to that?

5 A He told me that he -- I would be seeing a nurse.

6 Q Okay.

7 A I guess it's --

8 Q Did he tell you when?

9 A No.

10 Q Go ahead.

11 A I guess it's protocol when you go -- come through and
12 you have to get some kind of medical clearance or
13 whatever. I'm not sure exactly.

14 Q So, did he say it's protocol for anybody that gets
15 booked into Muskegon County Jail to -- to see a nurse,
16 that is it -- or -- or only injured people?

17 A Everybody.

18 Q So, everybody has to see a nurse?

19 A For basic like medications and just basic stuff.

20 Q Okay.

21 A Basic information that the facility may need.

22 Q So, Hairston comes in and did -- does he go through any
23 -- any of -- any screening procedures? I -- I know that
24 you had given me that -- that -- did that -- was that
25 taken at that point in time?

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1 trauma and the answer is no. Were you exhibiting any
2 signs of trauma at that point in time?

3 A I believe I was.

4 Q What do you believe you were exhibiting?

5 A Pain.

6 Q Well, I understand that. Pain, that you were hurting.

7 But what --

8 A I was expressing my pain. I told him I was hurting
9 several times. I need to see a doctor. I didn't want
10 to answer questions.

11 Q No, I -- I understand that. But were -- did -- did you
12 have any marks on you, any bruises, any cuts --

13 A No.

14 Q -- limping, were --

15 A I was limping.

16 Q You were limping. So, would that not be a visible sign
17 of trauma; did he see you limp?

18 A I -- yes, he did.

19 Q He did? Well, where were you limping?

20 A From the issue with my wrist during fingerprinting.

21 Q How were you limping with your wrist?

22 A I said this -- the issue that I was having my wrist. I
23 could barely stand up straight without being in physical
24 pain and I was having issues during fingerprinting with
25 my wrist and he knew that.

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1 Q You did see a nurse. When did you see the nurse?

2 A Prior to going to the second floor security cell.

3 Q Okay. Well, that's important.

4 MS. OLSEN: Before what, the --

5 THE WITNESS: Being -- being taken to the cell
6 on the second floor.

7 MS. OLSEN: Okay.

8 BY MR. YANALUNAS:

9 Q So, okay. Who -- what nurse did you see?

10 A Her name's Elaine Garrett.

11 Q Elaine Garrett. Okay. And what do you tell -- what do
12 you tell Elaine?

13 A That I'd just been in an accident and I needed to see a
14 doctor. She asked me did I have health insurance and
15 what medications I was on.

16 Q So, this -- so, this -- this -- was it a physical that
17 she was doing?

18 A No.

19 Q Was -- was this that original -- you told me before it
20 was protocol that every person sees a nurse, right?

21 A And that's -- that's --

22 Q Was that what this was?

23 A Exactly.

24 Q Okay. So, she asked if you have health insurance and
25 about your medication?

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1 see a doctor.

2 Q Same nurse, Elaine?

3 A No, it was different nurses, different times. They made
4 rounds and administered medication to those who need it.

5 Q And this is when you saw Dr. Joseph Natole?

6 A Yes.

7 Q On 9/5/2014?

8 A Yes.

9 Q And he diagnosed you with a lumbar sprain?

10 A Yes.

11 Q And you didn't ever have an X-ray or MRI. What do you
12 recall him doing for your examination?

13 A He -- I had to take my shirt off and he -- he did some
14 kind of examination to my back, my lower back. And
15 after that he wrote down some notes and talked to the
16 nurse and I was -- I was told to put my shirt back on
17 and stuff and then they transported me back up to the
18 cell. But he told me he was gonna be prescribing me
19 medication for the pain and some muscle relaxers and all
20 of this stuff.

21 Q Okay. Did you find the pain -- the prescription
22 effective?

23 A Not really.

24 Q No?

25 A It -- it -- it helped as far as -- I mean it just made

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1 A She --
2 Q -- for you?
3 A -- she -- she referred me to see the doctor, but I -- I
4 never seen him 'cause I was transferred to Quarantine
5 shortly after that.
6 Q Okay. So, did you see a doctor at Quarantine?
7 A Yes.
8 Q All right. And that's Jackson Quarantine, right?
9 A Yes.
10 Q Who did you see there?
11 A I believe her name is Renee, but I don't recall the --
12 her exact full name.
13 Q Okay. Was she like a doc -- like an M.D., N.P., do you
14 recall?
15 A I'm not sure.
16 Q Was she a nurse or doctor?
17 A I'm not -- I couldn't -- I don't remember.
18 Q And what did Renee do for you?
19 A She prescribed Naproxen.
20 Q And what is Naproxen supposed to do; overall pain
21 management you said?
22 A It's a pain -- it's a pain relief.
23 Q Okay. Is it effective?
24 A Yes.
25 Q And have you been on it sense being prescribed it in

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1 A Muskegon Temporary is level one. Brooks is level two.

2 Q All right. 'Cause -- all right. I believe I wrote down

3 -- that's fine. So, you go to Brooks. Who do you see

4 at Brooks?

5 A I saw the doctor actually at Brooks. The nurse first

6 and then the doctor.

7 Q So, you saw -- so you saw the nurse. What'd the nurse -

8 - and what did the nurse do for you?

9 A The nurse printed out some exercises and she referred me

10 to see the doctor, gave me some pain medication.

11 Q The nurse gave you pain medication?

12 A Yes.

13 Q What kind of medication?

14 A I believe Tylenol or that -- Motrin. Motrin.

15 Q Motrin?

16 A Motrin, I believe so.

17 Q So, she just told you to go do some exercises and take

18 some Tylenol?

19 A Yes.

20 Q Do you recall who it was?

21 A I don't recall her name.

22 Q Do you recall the doctor's name?

23 A I don't recall his name either.

24 Q But it was a male?

25 A Yes.

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1 Q You were in the backseat on the right hand side,

2 correct?

3 A Yes.

4 Q And you said you had belly chains, which are what,
5 around your waist with your wrists?

6 A No, the belly chains are -- goes around the waist and
7 then there's two handcuffs connected to the chains so
8 your wrists is basically connected to your waist.

9 Q Got it. And then you had ankle chains or --

10 A Yes.

11 Q It's hard to walk with ankle chains, is it not?

12 A Absolutely.

13 Q You have to -- you have to be helped or you're liable to
14 fall over, isn't that true; lose your balance --

15 A No.

16 Q -- and fall?

17 A No, you can -- you can actually maintain your balance.
18 You just can't move in hast. You have to --

19 Q Shuffle along?

20 A -- short steps.

21 Q All right. So, Officer Kasher's driving and Officer

22 Neher is in the front passenger side head of you,

23 correct?

24 A Yes.

25 Q And in this patrol car, there's a partition between the

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1 front and the back?

2 A Yes.

3 Q Was it solid metal or was it metal up to a certain
4 elevation and then it was glass?

5 A Yes.

6 Q Yes what?

7 A It was like half whatever material. I don't know if
8 that's metal or hard plastic. I'm not sure what that
9 is. But from there and then there's a window with bars.

10 Q So, the partition might've been made of hard plastic or
11 some other material other than metal?

12 A Yes.

13 Q So, how far along were you in this trip when the
14 accident occurred?

15 A I would say 15, 20 minutes.

16 Q And were you awake when the accident occurred?

17 A Yes.

18 Q Were you awake at all times during your transport?

19 A Yes.

20 Q Was there any conversation with the officers during your
21 transport?

22 A Between me --

23 Q Yeah.

24 A -- or between the officers?

25 Q No, between you and the officers?

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1 A I didn't -- there was cars on the side of us.

2 Q Cars on the side of what?

3 A On the side of the vehicle that I was in. There was
4 cars on the right hand side.

5 Q So, cars prevented you from seeing the deer that
6 suddenly ran out in the road?

7 A Exactly.

8 Q Before the -- did -- did the deer actually strike that
9 vehicle?

10 A Yes.

11 Q Before that occurred, did you feel the -- Officer Kasher
12 attempt to avoid the deer by applying the brakes?

13 A Not -- not prior to the impact.

14 Q So, are you saying that you're certain that he didn't
15 apply the brakes or are you not sure?

16 A I don't believe he applied the brakes until after the
17 impact.

18 Q Did you feel or see any evasive maneuvers before impact
19 with the deer?

20 A No.

21 Q Did you see the actual deer -- did you see the deer
22 impact with the vehicle?

23 A I -- yeah, I seen the deer. Actually, it looked like it
24 was gonna come over the hood, but it went under the
25 vehicle.

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1 right hand, I believe?

2 A Left hand.

3 Q I thought you said the right hand?

4 A I never said which hand it was.

5 Q So, when you had this previous break, it was to the --

6 because you were in a fight, that was the left hand?

7 A Yes.

8 Q Did you -- were you casted for that injury?

9 A Yes.

10 Q Had you ever suffered an injury to your right hand

11 before?

12 A No.

13 Q Are you left or right handed?

14 A Right handed.

15 Q When Officer Neher opened your door and looked in, as I

16 understand, you told him that you may need to see a

17 nurse or a medic?

18 A Yes.)

19 Q And, I take it that was because you were feeling some

20 sort of pain?

21 A Yes.)

22 Q Did you describe where you were feeling the pain?

23 A I just told him my wrist -- it was -- it was swell -- my

24 wrist started swelling -- swelling up. You could

25 literally see that my wrist was -- something was wrong

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1 with it.

2 Q So, your --

3 A I -- I don't think it was broken. I just hyperextended
4 it and it started swelling up and I let him know that my
5 back was feeling strange.

6 Q Strange you say?

7 A Yeah, 'cause it -- something was wrong.

8 Q Okay. So, immediately, you're saying, your right wrist
9 started to swell?

10 A Not immediately, but eventually, over time just sitting
11 in the car, after the injury it started swelling up.

12 Q So, when did it start to swell? I mean you -- was that
13 before the pol -- the state police arrived or after?

14 A It was swelling when the state police got there.

15 Q So, within a half an hour?

16 A Yeah.

17 Q Do you remember after the accident the officers turned
18 and asked if you were okay?

19 A I don't recall.

20 Q So, if they say they turned and asked you if you were --
21 you were okay and you answered yes, you don't -- you
22 just don't remember that?

23 A I never -- I never told them I was okay, so I don't
24 recall them asking me at all.

25 Q So, you don't remember telling them, after the accident,

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1 that you were okay?

2 A No.

3 Q And you would deny that ever told them that you were
4 okay?

5 A Absolutely.

6 Q So, it's not a question of I don't remember. You
7 specifically deny telling them you were okay?

8 A I specifically deny telling them that I was okay, yes.

9 Q Did you use some other word like I'm straight or I'm
10 fine or I'm --

11 A No.

12 Q Didn't say anything like that?

13 A No.

14 Q All right. So, did -- did Officer Neher leave the door
15 open when he checked on you?

16 A No.

17 Q And you say he looked in to see whether you were okay?

18 A I believe that's what he was doing.

19 Q And -- and you agree, at that point, there was no blood,
20 there was no broken bones, there was no obvious injury?

21 A No.

22 Q No what?

23 A It wasn't -- I wasn't bleeding or broken up or nothing
24 like that.

25 Q Okay. So, you weren't bleeding?

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1 A No.

2 Q You weren't -- there were no broken -- no obvious broken
3 bones?

4 A Right.

5 Q No obvious injuries at all, correct?

6 A Not that you could just be like yo, he's injured; let's
7 do something.

8 Q So, then they're going and doing some business and then
9 Officer Kasher came and you say he opened the window in
10 the front seat because it was hot in the vehicle?

11 A I believe that's why he did it, but he never told me he
12 was opening it for that reason. It was -- you could
13 feel the -- I was sweating, so he eventually came and
14 opened -- opened the door and rolled the window down and
15 walked -- walked away.

16 Q So, it was your belief that he did that though because
17 you were in the car and it was warm?

18 A It was hot.

19 Q Can you answer my question? Do you believe that's why
20 he did that, because you're in the vehicle and it's hot?

21 A Yes.

22 Q Okay.

23 A You can die from being trapped in a vehicle --

24 Q So, there --

25 A -- with the windows --

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1 Q -- then you realized, I assume, that they had called the
2 state police because I think you said within 20 to 30
3 minutes the state police arrived?

4 A Yes.

5 Q And during the time that you were in the vehicle, you
6 were not yelling or screaming or saying, you know, I'm
7 in pain, I need help or anything like that, correct?

8 A I wasn't screaming and yelling, no. I don't -- I don't
9 scream or yell.

10 Q And then the state police arrived and this Officer Kurt
11 -- it looks like Erike or something like that -- he
12 comes and opens the door and, again, asks you if you're
13 hurt, correct?

14 A He -- he's the only person that asked me if I was hurt
15 or not.

16 Q He's the only person that asked you if you were hurt?
17 So, you don't think that Officers Neher or Kasher asked
18 you that?

19 A No.

20 Q And when he asked you if you were hurt, again you said I
21 may need to see a medic or a nurse, correct?

22 A Yes.

23 Q So, he looks in, you make that statement and he leaves?

24 A Right.

25 Q Which is essentially the same statement that you told

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1 Q So, everybody involved in this change should've been
2 able to see that you couldn't walk?

3 A Yes.

4 Q And similarly, Deputy Hairston should've observed that
5 you couldn't walk when he was doing the intake?

6 A Yes. He -- he did observe because he asked me about the
7 -- he asked me about the actual accident after I was
8 explaining it to him.

9 Q Now, in terms of your right wrist, I'm not -- it wasn't
10 apparent to me that you ever had any treatment for it.)

11 Is that a true statement; is that fair and accurate?

12 A Yes.)

13 Q Never had any treatment at all?

14 A No treatment for it at all.)

15 Q Were you -- did anybody ever even examine your right
16 wrist?

17 A The nurse did, but it wasn't -- it -- it was --
18 according to her it wasn't nothing that she could do
19 about it at the time.

20 Q So, Nurse Elaine, whatever her last name is, looked at
21 your right wrist and determined that there was nothing
22 that could be done?

23 A Yes, at the moment, 'cause she wasn't -- she was just
24 basically asking basic intake questions that had nothing
25 to do with the actual physical examination or she wasn't

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1 issues, the -- the shot and just basic stuff. It wasn't
2 no -- nothing ex -- you know, elaborate.

3 Q When you told our clients, Officers Kasher and Neher,
4 that you may need to see a medic or a nurse, did they
5 say anything to you about your complaints of pain?

6 A They told me to -- I -- I think they told me that I
7 would be seeing somebody at the jail or let the jail
8 know or something to that effect.

9 Q So, in other words, when -- when you get taken to the
10 jail, you will likely be seen by somebody; that's what
11 you think my officers told you?

12 A Yes.

13 Q So, if -- if that's the case then and you're in the
14 process of being transported to Muskegon County, what do
15 you claim was the delay on their part in your ability to
16 obtain medical attention or medical treatment?

17 A The delay by your clients?

18 Q Yeah.

19 A They never -- they never called ahead to notify anybody
20 of the accident besides the person, whoever they
21 requested a transport vehicle for. So, once I arrived
22 to the county jail, nobody knew I was in an accident.

23 Q So, you're saying my clients should've called ahead and
24 let the Muskegon County Jail know that you'd been in an
25 accident?